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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY *gms* DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury **07 CR 30 41 LAB**

UNITED STATES OF AMERICA,	)	Criminal Case No. _____
	)	
Plaintiff,	)	<u>I N D I C T M E N T</u>
	)	
v.	)	Title 21, U.S.C., Sec. 841(a)(1) -
	)	Possession of Methamphetamine with
JOE VANG,	)	Intent to Distribute;
aka Khoi Dang Pham,	)	Title 18, U.S.C., Sec. 924(c)(1) -
	)	Possession of a Firearm in
Defendant.	)	Furtherance of a Drug Trafficking
	)	Crime; Title 18, U.S.C.,
	)	Secs. 922(g)(1) and 924(a)(2) -
	)	Felon in Possession of Firearm;
	)	Title 18, U.S.C., Sec. 924(d), and
	)	Title 28, U.S.C., Sec. 2461(c) -
	)	Criminal Forfeiture

The grand jury charges:

Count 1

On or about October 6, 2007, within the Southern District of California, defendant JOE VANG, aka Khoi Dang Pham, did knowingly and intentionally possess, with intent to distribute, 50 grams and more, to wit: approximately 110 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

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Count 2

On or about October 6, 2007, within the Southern District of California, defendant JOE VANG, aka Khoi Dang Pham, in furtherance of a crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute methamphetamine, the crime charged in Count 1 of this Indictment, did knowingly possess firearms, that is, a 9mm Smith and Wesson semi-automatic handgun, serial number SAE2291; and a .44 caliber ARMI Jager revolver, serial number 41867; all in violation of Title 18, United States Code, Section 924(c)(1).

Count 3

On or about October 6, 2007, within the Southern District of California, defendant JOE VANG, aka Khoi Dang Pham, being a person who had previously been convicted in a court, that is, the Superior Court of California, County of San Diego, of a crime punishable by imprisonment for a term exceeding one year, that is, taking a vehicle without the owner's consent in violation of California Vehicle Code 10851(a) and possession of a controlled substance in violation of California Health and Safety Code 11377(a), did knowingly and unlawfully possess in and affecting commerce a firearm, that is, an FI .380 caliber semi-automatic handgun, serial number CPA029385; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

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Count 4

On or about October 6, 2007, within the Southern District of California, defendant JOE VANG, aka Khoi Dang Pham, being a person who had previously been convicted in a court, that is, the Superior Court of California, County of San Diego, of a crime punishable by imprisonment for a term exceeding one year, that is, taking a vehicle without the owner's consent in violation of California Vehicle Code 10851(a) and possession of a controlled substance in violation of California Health and Safety Code 11377(a), did knowingly and unlawfully possess in and affecting commerce a firearm, that is, a 9mm Smith and Wesson semi-automatic handgun, serial number SAE2291; and a .44 caliber APMT Jager revolver, serial number 41867; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

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FORFEITURE ALLEGATION

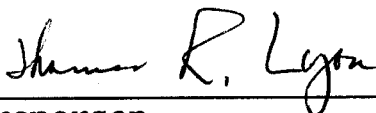
The allegations contained in Counts 2, 3, and 4 are realleged and by reference are fully incorporated herein to allege forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in Counts 2, 3, and 4, knowing violations of Title 18, United States Code, Sections 922(g) and 924, defendant shall forfeit to the United States all firearms and ammunition involved or used in the offense, including, but not limited to, the firearms alleged in Counts 2, 3, and 4.


All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

DATED: November 8, 2007.

A TRUE BILL:

  
Foreperson

KAREN P. HEWITT  
United States Attorney

By:   
PETER KO  
Assistant U.S. Attorney